

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

NATHANIEL J. BROUGHTY,  
Plaintiff,  
v.  
CHRISTOPHER E. BOUZY,  
Defendant.

**Oral Argument Requested**

Case No. 2:22-cv-6458-SDW-AME

**NOTICE OF MOTION TO  
DISMISS PURSUANT TO  
FEDERAL RULE OF CIVIL  
PROCEDURE 12(b)(6)**

**MOTION TO DISMISS COMPLAINT**

TO: Ronald D. Coleman  
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*Attorneys for Plaintiff*

**PLEASE TAKE NOTICE** that on February 6, 2023, or as soon thereafter as counsel may be heard, the undersigned attorneys for Defendant Christopher E. Bouzy will move the United States District Court for the District of New Jersey, the Honorable Susan D. Wigenton, at the Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, NJ 07101, for an Order dismissing the Complaint filed by Plaintiff Nathaniel J. Broughty (“Plaintiff”), with prejudice, pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure.

**PLEASE TAKE FURTHER NOTICE** that the undersigned shall rely upon the accompanying memorandum of law in support of this motion and the Certification of William P. Reiley and exhibits thereto. Pursuant to Local Civil Rule 78.1(b), Defendant respectfully requests that the Court hold oral argument on this Motion.<sup>1</sup>

**PLEASE TAKE FURTHER NOTICE** that a proposed form of Order is attached hereto.

Dated: January 9, 2023

Respectfully submitted,

**BALLARD SPAHR LLP**  
A Pennsylvania Limited Liability Partnership

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*Attorneys for Defendant Christopher Bouzy*

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<sup>1</sup> Consistent with the preference expressed by several judges in this District for providing courtroom opportunities for newer attorneys, Maxwell S. Mishkin, an associate at Ballard Spahr LLP, would present the argument for Defendant.